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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

DENNIS FALASCHI,

Defendant.

Case No. 1:22-cr-00103-JLT-SKO

MOTION TO CONTINUE CHANGE OF
PLEA HEARING

IT IS HEREBY STIPULATED between the parties that the change of plea hearing scheduled for March 11, 2024, may be continued until April 22, 2024, at 9:00 a.m., before the Honorable Jennifer L. Thurston. The parties have met and conferred on two occasions since vacating the trial date in early February. The government has produced additional, newly acquired discovery to defense counsel, and defense counsel has produced reciprocal discovery to the government. The parties are reviewing and considering this discovery in connection with the plea offer to Mr. Falaschi. Therefore, the parties request more time to finalize a plea agreement.

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1 The parties request that the Court exclude time under the Speedy Trial Act from March 4,
2 2024, through April 22, 2024, for purposes of plea negotiations, defense preparation, and
3 continuity of defense counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).
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6 Dated: March 4, 2024

/s/ Marc Days

MARC DAYS

Counsel for Dennis Falaschi

8
9 Dated: March 4, 2024

/s/ Joseph Barton

JOSEPH BARTON

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Assistant United States Attorneys
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ORDER TO CONTINUE CHANGE OF
PLEA HEARING

Upon the parties' stipulation, and for good cause shown, the change of plea hearing that is scheduled for March 11, 2024, is continued until April 22, 2024, at 9:00 a.m., before the Honorable Jennifer L. Thurston. Time is excluded under the Speedy Trial Act from March 4, 2024, through April 22, 2024, for purposes of plea negotiations, defense preparation, and continuity of defense counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: March 6, 2024


UNITED STATES DISTRICT JUDGE